

## Whistleblowing Policy & Fraud Prevention Policy

We are committed to conducting our business with honesty and integrity, and we expect all employees to maintain high standards. It is important to MCFT that any fraud, misconduct or wrongdoing by employees is reported and properly dealt with, and we therefore encourage all colleagues to raise any concerns that they may have regarding the conduct of others, or regarding practices they feel they need to report on.

All organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

The aims of this policy are:

- a) To encourage employees to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- b) To provide employees with guidance as to how to raise those concerns.
- c) To reassure employees that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

### What is whistleblowing?

**Whistleblowing** is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include the following but is not exhaustive:

- a) criminal activity;
- b) miscarriages of justice;
- c) danger to health and safety;
- d) damage to the environment;
- e) failure to comply with any legal obligation or regulatory requirements;
- f) financial fraud or mismanagement;
- g) negligence;
- h) breach of our internal policies and procedures;
- i) conduct likely to damage our reputation;
- j) unauthorised disclosure of confidential information;
- k) the deliberate concealment of any of the above matters
- l) sexual harassment/harassment/bullying within the workplace.

A **whistleblower** is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a **whistleblowing concern**) you should report it under this policy.

## Scope of Policy

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the Grievance Procedure or Anti-Harassment and Bullying Policy (MCFTP004 or MCFTP017 respectively) as appropriate.

If you are uncertain whether something is within the scope of this policy you should seek advice from one of the persons named below under the “Raising a Whistleblowing Concern” section.

## Raising a Whistleblowing Concern

We hope that in many cases you will be able to raise any concerns with your Line Manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases they may refer the matter to the Whistleblowing Officer.

However, where the matter is more serious, or you feel that your Line Manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should report the matter to the Whistleblowing Officer, Sally Connolly – People Manager, or in her absence, Lauren Mansie HR Advisor, and send an email to [sally.connolly@mcft.com](mailto:sally.connolly@mcft.com) or [lauren.mansie@mcft.com](mailto:lauren.mansie@mcft.com).

A meeting will be arranged with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

On conclusion of the investigation, the employee will be told the outcome of the investigation and any action taken. If no action is taken then a reason will be provided.

If on conclusion the employee feels the appropriate action has not been undertaken, they can report the matter the Group CEO and/or UK Managing Director.

## Confidentiality

We hope that employees will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage employees to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible.

Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer and appropriate measures can then be taken to preserve confidentiality.

## **External disclosures**

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body, such as a regulator. It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

Whistleblowing concerns usually relate to the conduct of our employees, but they may sometimes relate to the actions of a third party, such as a customer or supplier. The law allows you to raise a concern with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to always report such concerns internally first. You should contact your Line Manager or one of the other individuals set out in this policy for guidance.

## **Investigation and outcome**

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

In some cases we may appoint an investigator or team of investigators including colleagues with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action.

## **If you are not satisfied**

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts whose details are set out at the end of this policy.

## **Protection and support for whistleblowers**

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support employees who raise genuine concerns under this policy, even if they turn out to be mistaken.

Employees must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform one of the individuals named in this policy immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure (MCFTP004).

Employees must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

## **Responsibility for the success of this policy**

Senior Management has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

Senior Management may delegate day-to-day operational responsibility for this policy to the Whistleblowing Officer. The Management will ensure that all managers and other employees who may deal with concerns or investigations under this policy receive appropriate training.

This policy should be reviewed from a legal and operational perspective at least once a year.

All employees are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the People Team.

## **Fraud Prevention**

MCFT take an active role against potential fraud. The presence of a Whistleblowing Policy highlights the process that should be followed in order to ensure all business activities are ethical, genuine and in the public interest.

## **Key Contacts**

Sally Connolly (Whistleblowing  
Officer/People Manager)

Tel: 07842 430954

Email: [sally.connolly@mcft.com](mailto:sally.connolly@mcft.com)

Lauren Mansie (Deputy Whistleblowing  
Officer/HR Advisor)

Tel: 07593 434782

Email: [lauren.mansie@mcft.com](mailto:lauren.mansie@mcft.com)

Iain Lindsay (Head of Organisational  
Development)

Tel: 07513724604

Email: [iain.lindsay@mcft.com](mailto:iain.lindsay@mcft.com)

**Protect Advice Line**

Helpline: 020 3117 2520 (\*option 1)

(Independent Whistleblowing Charity)

[whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk)

Website: <https://protect-advice.org.uk>

Associated Policies

Grievance Policy – MCFTP004

Disciplinary Policy – MCFTP005a/005b

Harassment & Bullying Policy – MCFTP017

Anti Bribery Policy – MCFTP013